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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JOSHUA WAYNE THOMPSON,  
  
Defendant.

CASE NO. 2:19-CR-236 MCE

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
ORDER

DATE: August 20, 2020

TIME: 10:00 a.m.

COURT: Hon. Morrison C. England, Jr.

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this Court set a status conference in this matter for August 20, 2020, and excluded time under the Speedy Trial Act through that date, pursuant to 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4). DE 24.

2. By this stipulation, the parties request that this Court continue the status conference to September 3, 2020, and exclude time from August 20, 2020, through September 3, 2020, under 18 U.S.C. § 3161(h)(7)(A), B(iv) (Local Code T4).

3. The parties agree and stipulate, and request the Court find, the following:

a) The government has represented that the discovery associated with this case includes investigative reports and related documents, as well as several photographs, in electronic form, totaling approximately 149 pages. All of that discovery has been either produced

1 directly to counsel or made available for inspection and copying.

2 b) Counsel for defendant desires additional time to consult with her client, to review  
3 the current charge, to conduct investigation and research related to that charge, to review  
4 discovery, and to otherwise prepare for trial.

5 c) Counsel for defendant believes that failure to grant the above-requested  
6 continuance would deny her the reasonable time necessary for effective preparation, taking into  
7 account the exercise of due diligence.

8 d) The government does not object to the continuance.

9 e) Based on the above-stated findings, the ends of justice served by continuing the  
10 case as requested outweigh the interest of the public and the defendant in a trial within the date  
11 prescribed by the Speedy Trial Act.

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f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of August 20, 2020, to September 3, 2020, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) (Local Code T4), because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO STIPULATED.

Dated: August 17, 2020

McGREGOR W. SCOTT  
United States Attorney

/s/ MATTHEW THUESEN  
MATTHEW THUESEN  
Assistant United States Attorney


Dated: August 17, 2020

/s/ HANNAH LABAREE  
HANNAH LABAREE  
Counsel for Defendant  
Joshua Wayne Thompson

**ORDER**

IT IS SO ORDERED.

Dated: August 18, 2020

  
MORRISON C. ENGLAND, JR.  
SENIOR UNITED STATES DISTRICT JUDGE